

SPEARS & IMES LLP

51 Madison Avenue
New York, NY 10010
tel 212 213-6996
fax 212 213-0849

November 10, 2021

BY ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Application
GRANTED
SO ORDERED
VSDJ
11-10-21

Re: *United States v. Rene Allard*, S4 20 Cr. 163 (PKC)

Dear Judge Castel:

[We respectfully write on behalf of defendant Rene Allard to request a temporary modification of the travel restrictions that are part of his bail conditions. With this Court's permission and the Government's consent, Mr. Allard traveled to the District of New Jersey on November 1, 2021 for a medical procedure. We respectfully ask that he be permitted to make a second medical visit on November 11, 2021 for a follow-up appointment relating to the same medical procedure, including the removal of stitches that were applied during the November 1 procedure.]

We reached out to the Government on the morning of November 9, 2021 about this request but have not yet heard back.

Thank you for your consideration of this request.

Respectfully submitted,

_____/s/_____
Max Nicholas
Attorney for Rene Allard